

## **EXHIBIT J- Plaintiff's Complaint**

### **LETTER TO MS. JASMINE PAUL**

**RE: DEFENDANT HPD'S CLAIM  
THAT DEFENDANT NICOLE LONDON  
IS A CURRENT HPD EMPLOYEE**

October 02, 2020

Assistant Corporation Counsel  
Honorable Counsel for HPD  
Ms. Jasmine Paul  
100 Church Street  
New York, NY, 10007

Dear Ms. Paul,

First, I am grateful for the kindness and humanity that you and counsel for Breaking Ground, Ms. Laura Juffa, have demonstrated. I am fully aware that facing a pro se litigant- who lacks basic knowledge can be frustrating for the opposing counsel<sup>1</sup>.

I am sharing what I humbly consider to be evidence that calls into question the ethics of your client- ostensibly, a public agency obliged to abide by the law and the appropriate standard of public integrity.

In my amended complaint, I expressed concerns as to whether Defendant Nicole London (“London”) was in fact HPD’s new project manager for Waterline Square. Defendant Gabriel Mombrun (“Mombrun”), with whom I conversed on multiple occasions, was originally the project manager for Waterline Square.

For reasons HPD refused to address in multiple FOIL requests, at an undisclosed point during the lease-up process, HPD replaced Mombrun with London, as the new project manager.

I am attaching the updated payroll records of all city employees- downloaded today from the City payroll platform.

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<sup>1</sup> In this regard, I respectfully clarify that I am by no means pro se by choice. I’ve applied to every NYC pro bono clinic, to no avail. This extraordinary disadvantage- attempting to communicate absent a grasp of the language of the law- is forced upon me.

It is deeply disturbing that according to the official city sources, there is no one HPD by the name Nicole London

Further, other platforms which derive their data from the official government sources suggest that no one by the name Nicole London has ever worked for HPD in any capacity

While there may be a genuine explanation- I am more than open to the possibility that I am mistaken- it is nevertheless alarming, considering the credible allegations in the amended complaint. For example: HPD's unbearable response to the revelation that affordable housing developers are purposefully stealing from the public \$100 million dollars by refusing to register affordable apartments as affordable; and sworn affidavits of six (6) whistleblowers, who were deemed credible by the Honorable Southern District Court, and who were awarded considerable financial settlements with taxpayer money- all within the last three (3) years.

As I continue to suffer unnecessarily, I appeal to the oath every lawyer takes upon being admitted to the legal profession, and ask all parties to recognize the merits of an expedited settlement.

Respectfully,

Abraham Gross

A handwritten signature in black ink, appearing to read "Abraham Gross".

DPT	NAME	ADDRESS	TTL #	PC	SAL-RATE
820	J L LONDIN	OFFICE OF ADMINISTRATIVE T	30087	A	\$ 91,563.00
846	M A LONDINO	DEPARTMENT OF PARKS & RECR	80633	U	\$ 15.00
57	G J LONDIS	FIRE DEPARTMENT	70310	D	\$ 85,292.00
56	A R LONDNER	POLICE DEPARTMENT	70210	D	\$ 54,394.00
71	A LONDON	DEPARTMENT OF HOMELESS SER	70810	A	\$ 48,745.00
998	A A LONDON	N.Y.C. TRANSIT AUTHORITY	00341	04	\$ 74,006.00
25	A G LONDON	LAW DEPARTMENT	30112	A	\$153,666.00
468	A LONDON	CUNY HOSTOS COMMUNITY COLL	04096	B	\$ 74,454.00
67	A F LONDON	ADMINISTRATION FOR CHILDRE	52287	A	\$ 45,759.00
996	A LONDON	N.Y.C. HOUSING AUTHORITY	90645	A	\$ 31,990.00
69	C A LONDON	HRA/DEPARTMENT OF SOCIAL S	10050	A	\$123,537.00
56	C T LONDON	POLICE DEPARTMENT	70210	D	\$ 85,292.00
998	C LONDON	N.Y.C. TRANSIT AUTHORITY	00341	04	\$ 78,730.00
67	C L LONDON	ADMINISTRATION FOR CHILDRE	52366	A	\$ 57,070.00
998	D LONDON	N.Y.C. TRANSIT AUTHORITY	00339	04	\$ 60,064.00
57	D G LONDON	FIRE DEPARTMENT	70310	D	\$ 55,192.00
468	D A LONDON	CUNY HOSTOS COMMUNITY COLL	10102	X	\$ 15.30
214	E LONDON	OFFICE OF LABOR RELATIONS	56056	A	\$ 41,848.00
998	E LONDON	N.Y.C. TRANSIT AUTHORITY	00351	04	\$ 66,920.00
998	E M LONDON	N.Y.C. TRANSIT AUTHORITY	00341	01	\$ 87,673.00
998	G S LONDON	N.Y.C. TRANSIT AUTHORITY	00913	04	\$ 75,400.00
468	G LONDON	CUNY HOSTOS COMMUNITY COLL	04980	A	\$ 74,119.00
868	I M LONDON	DEPARTMENT OF CITYWIDE ADM	80609	A	\$ 39,905.00
996	J LONDON	N.Y.C. HOUSING AUTHORITY	90698	K	\$ 232.00
998	J A LONDON	N.Y.C. TRANSIT AUTHORITY	00581	01	\$ 97,717.00
998	K A LONDON	N.Y.C. TRANSIT AUTHORITY	00298	01	\$ 93,524.00
56	K R LONDON	POLICE DEPARTMENT	71012	A	\$ 40,637.00
998	K LONDON	N.Y.C. TRANSIT AUTHORITY	00339	04	\$ 48,052.00
998	L LONDON	N.Y.C. TRANSIT AUTHORITY	00681	04	\$ 65,829.00
846	L A LONDON	DEPARTMENT OF PARKS & RECR	71205	U	\$ 19.47
998	L H LONDON	N.Y.C. TRANSIT AUTHORITY	00817	04	\$ 75,400.00
998	L LONDON	N.Y.C. TRANSIT AUTHORITY	00821	04	\$ 66,352.00
998	L W LONDON	N.Y.C. TRANSIT AUTHORITY	00339	04	\$ 60,064.00
69	L LONDON	HRA/DEPARTMENT OF SOCIAL S	10251	A	\$ 36,390.00
998	M L LONDON	N.Y.C. TRANSIT AUTHORITY	00339	04	\$ 36,039.00
32	M A LONDON	DEPARTMENT OF INVESTIGATIO	31130	A	\$ 59,083.00
998	N A LONDON	N.Y.C. TRANSIT AUTHORITY	00816	04	\$ 75,400.00
841	P Q LONDON	DEPARTMENT OF TRANSPORTATTI	90692	W	\$ 26.15
903	P M LONDON	DISTRICT ATTORNEY-KINGS CO	56057	A	\$ 57,448.00
998	P E LONDON	N.Y.C. TRANSIT AUTHORITY	00816	04	\$ 75,400.00

The screenshot shows a web browser window with the URL <https://www.seethroughny.net/payrolls>. The page has a dark blue header bar with navigation links: PAYROLLS, PENSIONS, CONTRACTS, EXPENDITURES, BENCHMARKING, NYS BUDGET, WAIVERS, and TEACHER PAY. Below the header is a pink banner with the text "Help keep this data online - DONATE NOW!". The main content area has a dark blue sidebar on the left with filter options: NAME (set to London, Nicole), YEAR, BRANCH/MAJOR CATEGORY, EMPLOYER/AGENCY, SUBAGENCY/TYPE, TITLE, TOTAL PAY, and SORT BY (set to Total Pay). The main search area has a teal header with the text "THIS SEARCH: 0 RESULTS" and a "SHARE THESE RESULTS" button. It includes columns for Name, Employer/Agency, Total Pay (sorted descending), and Subagency/Type. A message at the bottom states: "There were no results that matched your criteria."

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Search Results - found 30 results

Name	State	Year	Job Title	Employer	Action
Nicole London Cromwell	FL	2016	N/A	Alachua Co School Board	<a href="#">View Salary &amp; Details</a>
Nicole London Cromwell	FL	2017	N/A	Alachua Co School Board	<a href="#">View Salary &amp; Details</a>
Nicole Alyson London	FL	2015	N/A	Orange Co School Board	<a href="#">View Salary &amp; Details</a>
Nicole Alyson London	FL	2016	N/A	Orange Co School Board	<a href="#">View Salary &amp; Details</a>
Nicole Brittany London	AR	2017	N/A	Cross County School District	<a href="#">View Salary &amp; Details</a>
Nicole Brittany London	AR	2017	N/A	Trumann School District	<a href="#">View Salary &amp; Details</a>
Nicole Brittany London	AR	2015	N/A	Cross County School District	<a href="#">View Salary &amp; Details</a>
Nicole Brittany London	AR	2016	N/A	Cross County School District	<a href="#">View Salary &amp; Details</a>
Nicole Janae London	TX	2018	Educational Aide	Grand Prairie Isd	<a href="#">View Salary &amp; Details</a>
Nicole Katie London	GA	2016	Poll Worker	County Of White	<a href="#">View Salary &amp; Details</a>
Nicole Latrice London	TX	2018	Teacher	Dallas Isd	<a href="#">View Salary &amp; Details</a>
Nicole London	WA	2017	Other Teacher	Lake Washington	<a href="#">View Salary &amp; Details</a>
Nicole London	LA	2018	N/A	School District Of Tangipahoa	<a href="#">View Salary &amp; Details</a>
Nicole London H	GA	2018	Kindergarten Teacher	Gwinnett County Board Of Education	<a href="#">View Salary &amp; Details</a>
Nicole London H	GA	2015	Kindergarten Teacher	Gwinnett County Board Of Education	<a href="#">View Salary &amp; Details</a>
Nicole London H	GA	2016	Kindergarten Teacher	Gwinnett County Board Of Education	<a href="#">View Salary &amp; Details</a>
Nicole London H	GA	2017	Kindergarten Teacher	Gwinnett County Board Of Education	<a href="#">View Salary &amp; Details</a>
Nicole London L	TX	2015	N/A	Department Of Family And Protective Services	<a href="#">View Salary &amp; Details</a>
Nicole London L	TX	2016	N/A	Department Of Aging And Disability Services	<a href="#">View Salary &amp; Details</a>
Nicole London L	TX	2018	N/A	Texas Department Of Criminal Justice	<a href="#">View Salary &amp; Details</a>
Nicole London L	TX	2017	N/A	Texas Department Of Criminal Justice	<a href="#">View Salary &amp; Details</a>
Nicole London P	MO	2016	Aide	Lutzinger	<a href="#">View Salary &amp; Details</a>
Nicole London P	MO	2017	Aide	Meramec Heights Elem	<a href="#">View Salary &amp; Details</a>
Nicole Tia London	GA	2018	Hr Spec	Human Services Department Of	<a href="#">View Salary &amp; Details</a>
Nicole Tia London	GA	2017	Help Desk Analyst	Accounting Office State	<a href="#">View Salary &amp; Details</a>
Nicole Tia London	GA	2016	Financial Ops Generalist	Corrections Department Of	<a href="#">View Salary &amp; Details</a>
Nicole Tia London	GA	2016	Hum Res Specialist	Juvenile Justice Department Of	<a href="#">View Salary &amp; Details</a>
Nicole Tia London	GA	2015	Hum Res Specialist	Juvenile Justice Department Of	<a href="#">View Salary &amp; Details</a>
Nicole Tia London	GA	2016	Help Desk Analyst	Accounting Office State	<a href="#">View Salary &amp; Details</a>
Nicole Tia London	GA	2019	Hr Generalist Spv	Georgia Department Of Human Services	<a href="#">View Salary &amp; Details</a>